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bcc

Subject DTSC's Comments on PRL Evaluation Flow Chart

Hi Rick,

DTSC has the following comments on the subject flow chart, which was handed out at the November 2007 BCT meeting. Some of these comments have already been mentioned during the December 18, 2007 conference call.

1. Although maximum chemical concentrations may be less than PRGs, the sampling program still needs to show that characterization is adequate to arrive at the "Yes" outcome.
2. The cumulative effect of all chemicals, organics and inorganics, must be accounted for when comparing maximum concentrations or EPCs to PRGs.
3. In the third diamond from the left on Page 5, the "range" needs to be defined or explained.
4. Depending on the meaning of the "range", the "Yes" arrow from this diamond may not be automatic. A management decision may have to be made to arrive at the "Yes" outcome.
5. Should this flow chart be used again, we recommend that the diamond on Page 6 and its two outcomes be revised to be consistent with the diamonds and their outcomes on Page 5. For example, the "Yes" arrow should lead to SEA recommendation and the "No" arrow should lead to Tier II. To accomplish this, the text inside the diamond needs to be changed to show the opposite, i.e., "greater" should be changed to "lesser".

Thanks for the opportunity to review the flow chart. Please call if you have any questions. And Merry Christmas.

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